

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

KIMBERLY GENEREUX,)	
)	
Plaintiff,)	
)	
v.)	
)	
COLUMBIA SUSSEX CORPORATION)	
d/b/a WESTIN CASUARINA HOTEL,)	
STARWOOD HOTELS & RESORTS)	
WORLDWIDE, INC., WESTIN LICENSE)	
COMPANY, WESTIN LICENSE)	Civil Action No. 05-CV-10879-JLT
COMPANY NORTH, WESTIN)	
MANAGEMENT COMPANY NORTH,)	
INC., WESTIN MANAGEMENT)	
COMPANY EAST, WESTIN NORTH)	
AMERICA MANAGEMENT COMPANY,)	
INC., GALLEON BEACH RESORT, LTD.,)	
and CORPORATE DEFENDANTS X1-)	
100,)	
)	
Defendants.)	
)	

**JOINT MOTION FOR ADDITIONAL TIME TO
COMPLY WITH DISCOVERY ORDER AND FILE LOCAL RULE 16.1 STATEMENT**

NOW COME plaintiff Kimberly Genereux (“Genereux”) and defendants Starwood Hotels & Resorts Worldwide, Inc., Westin License Company, Westin Management Company North f/k/a Westin License Company North, Westin Management Company East and Westin North America Management Company (collectively, the “Starwood Defendants”) and defendant Columbia Sussex Corporation d/b/a Westin Casuarina Hotel and hereby jointly request up to and including April 28, 2006, to comply with the Court’s April 5, 2006, Discovery Order and file their Local Rule 16.1 joint statement in this case.¹

¹ The remaining defendant in this case, Galleon Beach Resort, Ltd., has not responded to the Complaint and no attorney has entered an appearance on its behalf.

As grounds for this Motion, the Parties state that:

1. As a result of certain corporate transactions that occurred between the date that the Starwood Defendants filed their Answer in this case and today, counsel for the Starwood Defendants is currently unsure whether it continues to represent all or only some of the Starwood Defendants. The requested extension will allow sufficient time for this issue to be resolved.
2. In addition, the requested extension will provide all the parties with adequate time to, among other things: (i) gather, prepare and produce, or determine the location of, relevant documents pursuant to Fed.R.Civ.P. 26(a)(1)(B); and (ii) prepare and have executed the sworn statements required by Local Rules 16.1(D)(3) and 26.1(B).
3. Because the requested extension is only to April 28, it will not delay the Scheduling Conference that is scheduled in this case for May 2, 2006.
4. As this is a joint motion, no party will be prejudiced by its allowance.

KIMBERLY GENEREUX

STARWOOD HOTELS & RESORTS
WORLDWIDE, INC., WESTIN LICENSE
COMPANY, WESTIN MANAGEMENT
COMPANY NORTH f/k/a WESTIN LICENSE
COMPANY NORTH, WESTIN
MANAGEMENT COMPANY EAST and
WESTIN NORTH AMERICA
MANAGEMENT COMPANY

By her attorney,

By their attorneys,

/s/ Mark F. Itzkowitz

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COLUMBIA SUSSEX d/b/a WESTIN
CASUARINA HOTEL

By its attorney,

/s/ John B. Johnson

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